

Darryl L. Jones, Esq.
109 W. 6th Avenue, Suite 200
Anchorage, AK 99501
Tel (907) 278-1212
Fax (907) 278-1213

Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

Salley C. Purser,)
)
Plaintiff,)
)
v.)
)
Josef F. Boehm, et. al.)
)
Defendants.)

Case No: A05-0085 (JKS)

AFFIDAVIT OF DEBORAH FENTON

STATE OF ALASKA)
)ss.
THIRD JUDICIAL DISTRICT)

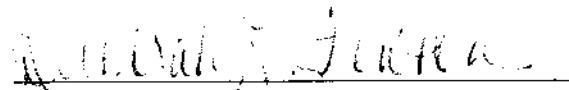
Deborah Fenton, being duly sworn, hereby states and deposes as follows:

1. I am a resident of the State of Alaska and have been for approximately 20 (twenty) years. I currently reside in Anchorage, Alaska.
2. I am employed as a Legal Assistant to Attorney Darryl Jones. I have been employed by Attorney Jones for approximately 3 (three) years;
3. I mailed via First Class Certified United States Mail Ms. Pursers' Responses to Defendant Boehm's Second Set of Discovery Requests on December 8, 2006 (Exhibit

DARRYL L. JONES
ATTORNEY AT LAW
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ANCHORAGE, ALASKA 99501
PH: (907) 278-1212 FAX: (907) 278-1213

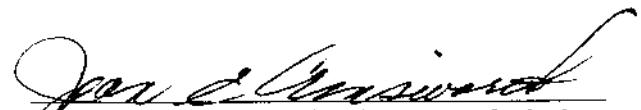
- A). I personally took said package to the United States Post Office;
4. The Law Office of Kenner and Associates, Defendant Boehm's counsel of record, received and signed for the envelope containing Ms. Purser's Answers to Defendant Boehm's Second Set of Discovery Requests on December 11, 2006 at 12:26 p.m.(Exhibit B);
5. I have attached the green card depicting that an employee of Attorney Kenner's Law Firm received and signed for Ms. Purser's Responses to Defendant Boehm's Second Set of Discovery Requests, which was received on December 11, 2006 (Exhibit C), which is attached and incorporated herein.

FURTHER AFFIANT SAYETH NAUGHT.


Deborah L. Fenton

SUBSCRIBED AND SWORN TO before me this 9th day of January, 2007 at Anchorage, Alaska.




Notary Public in and for the State of Alaska
My Commission Expires: 3/28/09



[Home](#) | [Help](#)

[Track & Confirm](#)

Track & Confirm

Search Results

Label/Receipt Number: **7006 0810 0000 2976 7986**
Status: **Delivered**

Your item was delivered at 12:26 PM on December 11, 2006 in ENCINO, CA 91436.

[Track & Confirm](#)

Enter Label/Receipt Number.

Notification Options

[Track & Confirm by email](#)

Get current event information or updates for your item sent to you or others by email. [Go >](#)



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EXHIBIT B
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UNITED STATES POSTAL SERVICE


 First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. G-10

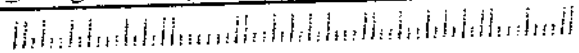
• Sender: Please print your name, address, and ZIP+4 in this box •

Lubkie
 The Law Office of Darryl Jones
 109 W. 6th Avenue, Suite 200
 Anchorage, Alaska 99501

DEC 08 2006

Power - Ans to 2nd Disc. Requests

C054



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Joseph Boehm
c/o Kenner Law Firm
1600 Ventura Blvd #1208
Encino CA 91436

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

- D. Is delivery address different from item 1? ☐ Yes
 If Yes, the delivery address is: ☐ No

RECEIVED

DEC 15 2006

LDJ
[Signature]

3. Service Type

- ☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

- ☐ Yes

2. Article Number

(Transfer from service label)

7006 0810 0000 2976 7986

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

EXHIBIT

Page

1

of

3



Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.

Certified Mail is *not* available for any class of international mail.

NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.

For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.

For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".

If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry. Internet access to delivery information is not available on mail addressed to APOs and FPOs.

DARRYL L. JONES
ATTORNEY AT LAW

109 W. 6TH AVE., SUITE 200
ANCHORAGE, ALASKA 99501

Josef Boehm
c/o David Kenner
Kenner Law Firm
16000 Ventura Blvd., Ste. 1208
Encino, CA 91436

CM/RR

EX-101

Page 2 of 3

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Josef Boehm
c/o Kenner Law Firm
1600 Ventura Blvd #1208
Erling CA 91436

COMPLETE THIS SECTION ON DELIVERY**A. Signature****X**
☐ Agent
☐ Addressee
B. Received by (Printed Name)**C. Date of Delivery**

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number

(Transfer from service label)

7006 0810 0000 2976 7986

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

vice™ MAIL™ RECEIPT No Insurance Coverage Provided	
visit our website at www.usps.com	
OFFICIAL USE	
.63 2.30 1.75 4.68	Postmark here
Boehm c/o Kenner Law Firm 1600 Ventura Blvd #1208 CA 91436	
See Reverse for Instructions	

EXHIBIT C

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Darryl L. Jones, Esq.
109 W. 6th Avenue, Suite 200
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Tel (907) 278-1212
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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF ALASKA

Salley C. Purser,)
)
Plaintiff,)
)
v.)
)
Josef F. Boehm, Allen K. Bolling,)
and Bambi Tyree,)
)
Defendants.)
)

Case No: A05-0085 (JKS)

**PLAINTIFF'S RESPONSES TO DEFENDANT BOEHM'S SECOND SET OF
DISCOVERY REQUESTS**

INTERROGATORY NO. 1: Question compounding in nature and this information has already been supplied to the Defendant on more than one occasion. Defendant has, in his own possession, the information requested with regard to the Federal Criminal charges he pled guilty to. The Plaintiff knows of the witnesses but does not personally know the witnesses, except for "E.A.", Kimberly Swentek, Bambi Tyree, Leslie Williams, Allen Bolling, Josef Boehm, Paxton Purser and Gerald Barnes. Some of these individuals the Plaintiff met while at Defendant Boehm's home during the period of 2001-2003.

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The other witnesses in this action are doctors and counselors, care providers and Dr. Rose and Francis Gallella which are two experts hired by the Plaintiff. Their vitae's, name, addresses and phone numbers have been supplied to Defendant Boehm twice.

INTERROGATORY NO. 2: At the time the Plaintiff met Defendant Boehm she did not attend school. The Plaintiff completed 9th grade and received her GED from "9 Star" in March 2005. Plaintiff also attended the Adult Learning Center in Anchorage, Alaska to complete her GED. This institution no longer exists. The Plaintiff was suspended in the 10th grade for suspected drug use. These were allegations but no proof of actual drug use. The Plaintiff decided on her own not to return to school after suspension.

INTERROGATORY NO. 3: The Plaintiff was arrested in May 2004 for misdemeanor possession of crack cocaine and is on Federal Probation until August 2009.

INTERROGATORY NO. 4: The Plaintiff has previously supplied this information twice to the Defendant, once in Preliminary Disclosures and by supplement months later.

INTERROGATORY NO. 5: The Plaintiff objects to this Interrogatory as it is overbroad, it shows no relevance and has a blanket time frame with no dates established.

INTERROGATORY NO. 6: Answered.

REQUEST FOR ADMISSION NO. 1: Admit.

REQUEST FOR ADMISSION NO. 2: Denied.

REQUEST FOR ADMISSION NO. 3: Admit. One time only.

REQUEST FOR ADMISSION NO. 4: Denied.

REQUEST FOR ADMISSION NO. 5: Admit.

REQUEST FOR ADMISSION NO. 6: Admit.

REQUEST FOR ADMISSION NO. 7: Admit. Twice only.

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EXHIBIT A
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REQUEST FOR ADMISSION NO. 8: Admit.

REQUEST FOR ADMISSION NO. 9: Admit.

REQUEST FOR ADMISSION NO. 10: Denied.

REQUEST FOR ADMISSION NO. 11: Admit.

REQUEST FOR ADMISSION NO. 12: Admit.

REQUEST FOR ADMISSION NO. 13: Denied.

REQUEST FOR ADMISSION NO. 14: No Admission No. 14. Defendant did not properly number his admissions.

REQUEST FOR ADMISSION NO. 15: Asked and Answered.

REQUEST FOR ADMISSION NO. 16: Denied.

REQUEST FOR ADMISSION NO. 17: Admit.

REQUEST FOR ADMISSION NO. 18: Denied.

REQUEST FOR ADMISSION NO. 19: Denied.

REQUEST FOR ADMISSION NO. 20: Admit.

REQUEST FOR ADMISSION NO. 21: Denied.

REQUEST FOR ADMISSION NO. 22: Plaintiff has no recollection and therefore Denied.

REQUEST FOR ADMISSION NO. 23: Denied.

REQUEST FOR ADMISSION NO. 24: Plaintiff objects to the verbage "traded sexual favors" and admits to having sex with other individuals.

REQUEST FOR ADMISSION NO. 25: Plaintiff once again objects to the verbage "traded sexual favors". Mr. Bucher was Plaintiff's boyfriend at one time.

REQUEST FOR ADMISSION NO. 26: Plaintiff has no knowledge and therefore Denied.

REQUEST FOR ADMISSION NO. 27: Denied.

DARRYL L. JONES

ATTORNEY AT LAW

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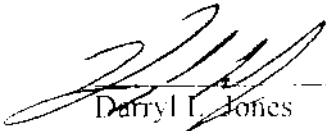
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REQUEST FOR ADMISSION NO. 28: Denied. Defendant Boehm was the primary cause of my drug dependency.

REQUEST FOR ADMISSION NO. 29: Denied. Plaintiff was never a prostitute.

REQUEST FOR ADMISSION NO. 30: Denied.

DATED this 6th day of December 2006 at Anchorage, Alaska.



Darryl L. Jones
Attorney for Plaintiff

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EXHIBIT A
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THE OFFICE OF THE ATTORNEY GENERAL

STATE OF ALASKA

OFFICE OF THE ATTORNEY GENERAL

... ..

... ..

Sally Burger
Sally Burger

... .. 4th day of December, 2006

State of Alaska
NOTARY PUBLIC
Deborah L. Fenton-Bushue
Commission No: 101289

Deborah L. Fenton-Bushue
NOTARY PUBLIC for Alaska
8/19/2009

EXHIBIT A
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Plaintiff,)

v.)

Josef F. Boehm, Allen K. Bolling,)
and Bambi Tyree,)

Defendants.)

Case No: A05-0085 (JKS)

CERTIFICATE OF SERVICE

This is to certify that on the 8th day of December, 2006, a true and correct copy of the foregoing document was caused to be mailed to the following parties of record via United States

Certified Mail:

Allen K. Bolling
Inmate No: 14911-006
USP Terre Haute
U.S. Penitentiary
P.O. Box 12015
Terre Haute, IN 47801
CM No.: 7006 0810 0000 2976 8006

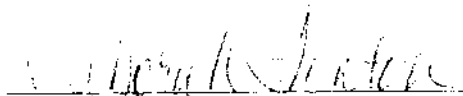
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EXHIBIT A
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Bambi Tyree
c/o Mary Pate
425 G Street, Suite 930
Anchorage, Alaska 99501
CM No: 7006 0810 0000 2976 7993

Josef Boehm
c/o David Kenner
Kenner Law Firm
16000 Ventura Blvd., Ste.1208
Encino, CA 91436
CM No: 7006 0810 0000 2976 7986

Pamela Sullivan
Wade, Kelley & Sullivan
733 W. 4th Avenue, Suite 200
Anchorage, Alaska 99501
CM No: 7006 0810 0000 2976 7962



Deborah Fenton
Legal Assistant to Darryl L. Jones

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